

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

In re:

417 Rentals, LLC

Debtor.

Case # 17-60935-11
Chapter 11

**DEBTOR'S RESPONSE TO CENTRAL BANK'S MOTION FOR RELIEF FROM
AUTOMATIC STAY OR FOR ADEQUATE PROTECTION**

FOR ITS RESPONSE to Central Bank's Motion for Relief from Automatic Stay or for Adequate Protection (Doc. 64), Debtor states as follows:

1. Debtor admits the allegations contained in Paragraphs 1 through 132, except that at this time, the Bank may not have claims for the recovery of fees and costs.
2. The Bank alleges that its claims are fully secured by the value of the real property described in various Paragraphs of the Motion.
3. Debtor alleges that the properties described in the Motion are necessary for its effective reorganization.
4. Debtor alleges that the rents paid are necessary to maintain the value of the collateral and to pay adequate protection.
5. Debtor alleges that any transfers of property did not prejudice or change the value of the Bank's collateral.
6. Debtor proposes adequate protection as follows:
 - (a) The Debtor will continue to make monthly interest payments to the Bank on the Promissory Notes subject to the Bank's Motion.
 - (b) The Debtor will continue to keep the property fully insured and will segregate payments for taxes.

(c) The Debtor will make all necessary repairs, maintenance and improvements in the property.

(d) The Debtor will promptly respond to and cure any deficiencies or complaints by any governmental unit involved in code violations or other regulatory requirements.

WHEREFORE, having fully responded to Central Bank's Motion for Relief from Automatic Stay or for Adequate Protection, the Debtor prays the Court enter an order granting the adequate protection contained in the Debtor's Response and authorizing the use of cash collateral, and for such other and further relief as is just and proper.

Respectfully submitted,

BERMAN, DeLEVE, KUCHAN & CHAPMAN, LLC

By: /s/ Joel Pelofsky

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ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that the foregoing Response was electronically filed with the Clerk of the Bankruptcy Court on this 12th day of October, 2017 and was served electronically on those parties receiving electronic notice through the Court's CM/ECF system, with an identical copy sent by United States Mail, postage prepaid and delivered to:

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/s/ Joel Pelofsky
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